

LAW OFFICES OF  
NIELSEN, HODGSON, PARRINELLO & MUELLER  
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

SACRAMENTO

1225 EIGHTH STREET, SUITE 550  
SACRAMENTO, CALIFORNIA 95814  
TELEPHONE (916) 446-6752

THE HARTFORD BUILDING

650 CALIFORNIA STREET, SUITE 2650  
SAN FRANCISCO, CALIFORNIA 94108  
TELEPHONE (415) 989-6800

FILE NUMBER

February 27, 1984

Janis Shank McLean, Esq.  
Legal Division  
Fair Political Practices Commission  
Post Office Box 807  
Sacramento, CA 95804

Re: Valuation of Fundraising Tickets Provided  
to Public Officials

Dear Ms. McLean:

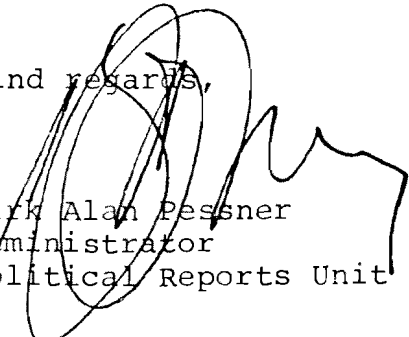
Pursuant to our phone conversation, I wish to  
restate the advice you gave me.

I described a situation in which Corporation A  
has purchased a table of tickets to a fundraising dinner  
for Candidate X. Public Official B has been invited as  
the guest of Corporation A to that fundraising event. The  
question is whether or not Corporation A has made a gift  
to Public Official B for the value of the fundraising dinner  
ticket.

You advised me that it has been the opinion of the  
staff of the FPPC that the value of the ticket to a fundraiser  
is nothing. Therefore, if Corporation A invites Public  
Official B to sit at its table at a fundraising dinner for  
Candidate X, no gift, as defined in Government Code Section  
82028, has been made by Corporation A or accepted by Public  
Official B and therefore Public Official B has no reporting  
responsibilities under Government Code Section 87207(a)(1)  
by reason of his attendance at the fundraising dinner.

Please confirm our conversation by signing the  
attached letter copy and returning it to me. If I have misstated  
any part of our conversation, please advise me at your earliest  
convenience.

Kind regards,

  
Kirk Alan Pessner  
Administrator  
Political Reports Unit

*Janis Shank McLean*  
Janis Shank McLean, Esq.